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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CHARLES RICHARD ROLAND,)	Case No. 1:21-cv-01249-EPG
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	(ECF No. 16)
)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 13-day extension of time, from August 4, 2022 to August 17, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time.

In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR) from the Eastern District. A review of the

1 records received shows Counsel has received at least 50 CARs, the majority of which were filed
2 in June 2022.

3 Additionally, for the weeks of August 1, 2022 and August 8, 2022, Counsel currently has
4 18 merit briefs, and several letter briefs and reply briefs. Additional time is needed to thoroughly
5 brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant
7 and Court for any inconvenience this may cause.

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10 Respectfully submitted,

11 Dated: July 22, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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13 By: /s/ Jonathan O. Peña
14 JONATHAN O. PENA
Attorneys for Plaintiff

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16 Dated: July 25, 2022

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

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21 By: */s/ Patrick Snyder
Patrick Snyder
Special Assistant United States Attorney
Attorneys for Defendant
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23 (*As authorized by email on July 25, 2022)
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ORDER

Based on the above stipulation (ECF No. 16), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment no later than August 17, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **July 26, 2022**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE